

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA,)	
)	Case No. 18 CV 3029
Plaintiff,)	
)	Judge John Robert Blakely
v.)	
)	Magistrate Judge M. David Weisman
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	JURY TRIAL DEMANDED

**DEFENDANTS' AGREED MOTION TO ENLARGE
SUMMARY JUDGMENT BRIEFING SCHEDULE**

Defendants City of Chicago ("City"), Reynaldo Guevara, Anthony Wojcik, John McMurray, George Figueroa, Edward Mingey, Robert Biebel, and JoAnn Halvorsen as special representative of Ernest Halvorsen (deceased) ("Defendant Officers") (collectively referred to as "City Defendants"), by and through their respective undersigned attorneys, move for an order extending the summary judgment briefing schedule. In support, City Defendants state:

1. On July 10, 2023, after the parties were unable to agree on a schedule, Plaintiff filed a motion requesting this Court set a summary judgment briefing schedule. (Dkt. 435.)
2. On July 12, 2023, this Court granted Plaintiff's motion in part (Dkt. 435), setting the following briefing schedule for the parties: a) motions for summary judgment to be filed by September 1, 2023; b) responses to be filed by September 29, 2023; and c) replies to be filed by October 13, 2023. (Dkt. 436.)
3. While the parties were unable to agree on a briefing schedule prior to this Court's scheduling order, after conferring further, the parties reached an agreement to extend the summary judgment deadlines due to defense counsels' professional obligations in other legal matters, as well as personal obligations.

4. Accordingly, Defendants request the Court extend the deadline for the parties to file summary judgment motions as follows: a) motions for summary judgment to be filed by October 6, 2023; b) responses to be filed by November 6, 2023; c) replies to be filed by November 20, 2023.

5. Defendants conferred with Plaintiff's counsel, who agrees to this request.

WHEREFORE, Defendants respectfully request this Court grant Defendants' motion and enter an order extending the deadline for the parties to file summary judgment motions to October 6, 2023, consistent with the proposed briefing schedule above.

Date: July 26, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Elizabeth R. Fleming, an attorney, certify that on **Wednesday, July 26, 2023**, I electronically filed the **Defendants' Agreed Motion to Enlarge Summary Judgment Briefing Schedule** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants.

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